



January 26, 2006

Re: Process for next BRTF meetings

Dear Chair Isenberg and Blue Ribbon Task Force members:

Thank you, Chair Isenberg, for laying out a process for the remaining Blue Ribbon Task Force meetings. We find it helpful, and would like to offer a couple of suggestions.

First, we urge the BRTF to make a clear decision as to whether any or all of the submitted proposals meet the MLPA goals and guidelines, including the Framework guidelines. Such guidance could provide serious motivation for proponents to make constructive changes in our packages.

Second, your memo notes that the BRTF has a mandate from Resources Secretary Mike Chrisman to submit alternative networks of MPAs by March 2006 and “may recommend a preferred alternative” to DFG. However, the Master Plan Framework adopted by the Fish & Game Commission in August is quite clear that the BRTF *will* recommend a preferred alternative to DFG. Specifically, Task 4, Activity 4.2 of the Framework (p. 32) says:

*“Forward proposals to Department. The task force forwards alternative proposals for MPAs, **a preferred alternative**, initial evaluations, and the general management plan, together with its own evaluation, to the Department for its consideration and submission to the Commission.”* (emphasis added)

This language reflects the fact that the BRTF was created to provide guidance and help the Department and Commission make difficult decisions. One of the most challenging decisions the Department faces is the choice of a preferred siting alternative (required by MLPA Section 2857 (a)). In our view, the Framework leaves no doubt that the BRTF’s role is to recommend alternatives, including a preferred alternative, to the Department.

Those who have developed proposals, NRDC included, have put in a great deal of work and are justifiably proud of those proposals. But we also recognize the importance of the perspective the BRTF brings—that of experienced decision makers who can be responsive to the broad public interest. You listened to all those science and stakeholder presentations precisely so you could later exercise your judgment. You should recommend which proposals move forward. You can recommend changes in packages and pick a revised package as preferred, or develop a preferred alternative by drawing from the proposals before you with the help of your staff, the SAT, the decision making tools, and consultations with proponents and the public. Your staff has effective tools and

a wealth of knowledge about the proposals and their strengths. In fact, they are the only ones with access to some socioeconomic data sets.

Finally, your memo lays out approaches for developing or determining a preferred alternative. Specifically, it says the BRTF fully expects to consider and, if appropriate, adopt modifications to proposed packages, or may extract various pieces from existing packages to create a recommended package. In our view, these approaches are sensible and appropriate.

NRDC remains willing to make changes to our proposal based on the results of the SAT analysis and recommendations by the BRTF. We trust, based on your admirable job so far keeping the process on track, that you will give us a clear deadline for making such changes so there is time for evaluation and further proposal development, if needed, by the BRTF and your staff. As always, we appreciate the opportunity to comment.

Respectfully,

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